&	1 2 3 4	Richard A. Lapping (SBN: 107496) TRODELLA & LAPPING LLP 540 Pacific Avenue San Francisco, CA 94133 Telephone: (415) 399-1015 Facsimile: (415) 651-9004 Rich@TrodellaLapping.com	
	5	Attorneys for Todd Greenberg	
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	7	UNITED STATES BANKRUPTCY COURT	
	8	NORTHERN DISTRICT OF CALIFORNIA	
	9	SAN FRANCISCO DIVISION	
	10		
	11	In re:	Case No.: 19-30088-DM
ng LL nue 94133	12	PG&E CORPORATION,	Chapter 11
appir : Aver), CA	13	-and-	DECLARATION OF TODD GREENBERG
Trodella & Lapping LLP 540 Pacific Avenue San Francisco. CA 94133	14 15 16 17 18 19 20	PACIFIC GAS & ELECTRIC COMPANY, Debtors. Affects PG&E Corporation Affects Pacific Gas and Electric Company Affects both Debtors * All papers shall be filed in the Lead Case, No. 19-30088 (DM).	IN SUPPORT OF RESPONSE BY TODD GREENBERG TO REORGANIZED DEBTORS' FORTIETH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY / PASSTHROUGH CLAIMS) Date: December 15, 2020 Time: 10:00 a.m. Place: (Telephonic Appearances Only) Courtroom 17 450 Golden Gate Avenue, 16 th Floor San Francisco, California Judge: Hon. Dennis Montali
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	23	I, Todd Greenberg, declare as follows:	
	24	1. I am over the age of 18 and the following facts are personally known to me, and if	
	25	called to do so, I could and would competently testify thereto.	
	26	2. I make this declaration in support	of my response to the Reorganized Debtors'
	27	Fortieth Omnibus Objections to Claims.	
	28	3. On October 21, 2019, I caused to	be filed with Prime Clerk three proofs of claim

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against Pacific Gas & Electric Company ("PG&E") numbered (by Prime Clerk) as Claim Numbers 77335 (for \$37,635.04), 78381 (for \$209,694.09), and 76018 (for \$299,228.89).

- Claim no. 77335, which is the subject of the Fortieth Omnibus Objection, concerned damage to a refrigerator, its contents, and an interior floor, located in the downstairs flat in a building owned by my family at 47 Bolinas Road, Fairfax, CA 94930. I lived in this flat at the time of the incident, but have sinced moved into the other unit.
- 5. The damage to my refrigerator occurred sometime between February 14, 2016 and Febuary 21, 2016, when my entire family was away on vacation for my father's 80th birthday. During this time, electrical power fluctuations—outages followed by surges—caused the starter relay in the refrigerator and freezer to fail, as diagnosed by the Appliance Repair Doctor of Alameda, California. This failure, while not affecting other refrigerator mechanicals, prevented the refrigerator freezer from functioning, and everything inside melted and spoiled, and then leaked onto the slightly outward sloping floor, so it spread across the entire kitchen. Upon my return home, I discovered the horrible spoiled melted food mess and the worst smell I've ever experienced.
- 6. At the time of the incident, PG&E had crews working on installing a three-phase power upgrade next door, at 31 Bolinas Road, and along Bolinas Road, for a newly built/being built restaurant location, which is a mixed use, commercial/residential complex that underwent an extensive renovation. At the time, I was told by PG&E crew members that the upgrade of the power to three-phase power was the cause of one of the many power outages, fluctuations, and related surges, including when a nearby pole transformer blew.
- 7. I was also informed by the Town Manager, Garret Toy, of the difficulties PG&E encountered while endeavoring to provide the 3 phase power next door at 31 Bolinas. These difficulties included needing to have traffic control and shutting down parts of the street, blowing of pole transformers, subsequently necessary replacements of many power provision components, many uncontemplated delays, and disruptions related to the age of the existing power provision equipment.
- 8. As indicated in my proof of claim, the appliance repair company replaced the starter relay, which had been burnt out by a power surge that could only have been caused by PG&E.

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- The damages that I incurred as a result of PG&E's activities include the loss of the 9. contents of my refrigerator and freezer, significant damage to the laminate floor, subfloor, and underlayment in the downstairs kitchen, which needs to be replaced, and other costs including relocation costs for me to move into the other unit, which I will update when this matter is heard.
- 10. After ascertaining the foregoing facts, I contacted PG&E and submitted a claim, which was shuttled between and among various legal and administrative personnel. Ultimately, a PG&E representative agreed that PG&E would pay my deductible if I submitted a claim on my homeowner's insurance. However, my broker advised against that as my rates would be increased or the insurance cancelled. I pursued this claim with PG&E through the beginning of 2017, as indicated by the emails attached to my proof of claim, without satisfactory resolution.
 - 11. The claim was never resolved before PG&E filed for bankruptcy.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed at Fairfax, California on December 1, 2020.

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